

EXHIBIT 4

Page 1

CONFIDENTIAL

Virtual Videotape Zoom Deposition of
Vijay Madisetti
Thursday, December 1, 2022
At 9:00 a.m.

24 Reported by LeShaunda Cass-Byrd, CSR, RPR
25 JOB NO. 220196

Page 2

1 Vijay Madisetti

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14 Also Present:

15 Kevin Marth, Videographer

1	Vijay Madisetti		
2	EXAMINATION OF VIJAY MADISETTI		
3	By Ms. Walsh	7	
4	DEPOSITION EXHIBITS		
5	EXHIBIT	DESCRIPTION	PAGE
6	Exhibit 1	Expert Report on Vijay Madisetti, Ph.D. on Infringement of the Family 4 and Family 6 Patents	22
7	Exhibit 2	Errata to Expert Report of Vijay Madisetti, PhD, on Infringement of The Family 4 and 6 patents	27
8	Exhibit 3	Rebuttal Expert Report of Vijay Madisetti, PhD, on the Validity of The Asserted Claim of the Family 4 Patent (U.S. Patent Number 8,090,008	29
9	Exhibit 4	Document Bearing Bates number TQD-TX-00043899 through 43908	54
10	Exhibit 5	U.S. Patent Number 6,657,949 to Jones, et. al	134
11	Exhibit 6	U.S. Patent 6,625,219 to Stopler	143
12	Exhibit 7	Rebuttal Expert Report of Vijay Madisetti, PhD, on validity of the Asserted claims of the Family 6 Patents (U.S. patent numbers 8,462,835; 8,594,162)	156

Page 4

1	Vijay Madisetti	
2	Exhibit 8 U.S. Patent Number 8,462,835	164
3	Exhibit 9 Temporary Document SC-060, Bates	
4	Number CommScope 007290 through 7299	210
5	Exhibit 10 Expert Declaration of Vijay K	
6	Madisetti, PhD.	219
7	Exhibit 11 Decision Granting Institution of	
8	Inter Parties Review	226
9		
10		
11		
12		
13		
14		
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19		
20		
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22		
23		
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Page 5

1 Vijay Madisetti

2 THE VIDEOGRAPHER: Good morning,
3 counselors. My name is Kevin Marth. I'm
4 the legal videographer today in association
5 with TSG Reporting, Inc.

Because this is a remote deposition,
I will not be in the same room with the
witness. Instead, I will record this
videotaped deposition remotely.

10 Additionally, our court reporter
11 today, Mrs. LeShaunda Byrd, also will not
12 be in the same room and will swear the
13 witness remotely.

14 Will parties stipulate to the
15 validity of this remote swearing and the
16 remote video recording and that it will be
17 admissible in the courtroom as if it had
18 been taken following Rule 30 of the Federal
19 Rules of Civil Procedure and the states
20 rules where this case is pending?

21 MS. WALSH: Yes, on behalf of
22 defendants.

23 MR. MCANDREWS: Yes, on behalf of TQ
24 Delta.

25 THE VIDEOGRAPHER: This marks the

Page 6

9 The remote video deposition today is
10 being held on December 1, 2022, and the
11 time on the video monitor is 9:09 a.m.

12 Again, my name is Kevin Marth. I'm
13 the legal videographer in association with
14 TSG Reporting, Inc. Our court reporter,
15 Mrs. LeShaunda Byrd, also in association
16 with TSG.

17 At this time, will counsel please
18 state your appearances for the record,
19 after which our court reporter will swear
20 in the witness and we may proceed.

21 MS. WALSH: This is Rachel Walsh from
22 Goodwin Procter in San Francisco on behalf
23 of the CommScope defendants.

24 MR. MCANDREWS: This is Peter
25 McAndrews from McAndrews, Held & Malloy on

Page 7

1 Vijay Madisetti

2 behalf of TQ Delta and the witness, Dr.

3 Vijay Madisetti.

4 VIJAY MADISSETTI,

5 having been first duly sworn, was examined and
6 testified as follows:

7 EXAMINATION

8 BY MS. WALSH:

9 Q. Good morning, Dr. Madisetti.

10 A. Good morning.

11 Q. As I sort of introduced myself a little bit
12 earlier on the record, I'm counsel for CommScope in
13 these matters, and I will be asking you some questions
14 today.

15 Could you please state and spell your name
16 for the record.

17 A. It's Vijay K. Madisetti, V-I-J-A-Y, K,
18 M-A-D-I-S-E-T-T-I.

19 Q. Okay. And what is your address?

20 A. It's 56 Creekside Drive.

21 (Court Reporter Clarification.)

22 THE WITNESS: 56 Creekside Park
23 Drive, Johns Creek, Georgia.

24 BY MS. WALSH:

25 Q. Where are you currently located?

Page 200

1 Vijay Madisetti

2 you referring to with -- when you say a signal that
3 has no information?

4 A. I meant that this did not have information
5 with -- as in the court's construction.

6 Q. And the court's construction excluded
7 having the FEC codeword counter value upon which the
8 updated fix setting is to be used, correct?

9 A. Yes.

10 Q. Okay. And so the flag signal could have
11 other information besides that, correct?

12 A. That is not -- that is not my
13 understanding. It should not have my -- that is my
14 opinion. My opinion is that it should not have the
15 codeword counter value as described in the court's
16 construction. I don't offer any hard word things as
17 to what it may or may not have.

18 Q. So in paragraph 69, you go on and describe
19 what I call an analogy to a white flag waived in
20 battle and a white flag waved in a Nascar race.

21 Do you see that?

22 A. Yes.

23 Q. And so you go on to describe that, and you
24 say, "The flag signal only indicates. It contains no
25 information," correct?

Page 230

1 Vijay Madisetti

REPORTER'S CERTIFICATE

3 I, LESHANDA CASS-BYRD, CSR No. B-2291, RPR,
4 Registered Professional Reporter, certify that the
5 foregoing proceedings were taken before me at the time
6 and place therein set forth, at which time the witness
7 was put under oath by me;

8 That the testimony of the witness, the questions
9 propounded, and all objections and statements made at
10 the time of the examination were recorded
11 stenographically by me and were thereafter
12 transcribed:

13 That the foregoing is a true and correct
14 transcript of my shorthand notes to taken.

15 I further certify that I am not a relative or employee
16 of any attorney or the parties, nor financially
17 interested in the action.

18 I declare under penalty of perjury under the laws
19 of North Carolina that the foregoing is true and
20 correct.

21 Dated this December 9, 2022.

23 *Lashaunda Byrd*

LESHAUNDA CASS-BYRD, CCR-B-2291, RPR